

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

George D. McCarley
Plaintiff

v.

Household Finance Corporation
Defendant

2007 NOV 14 Civil Action No. 3:06-CV-0091-MEF
Lead Case¹

EBRA P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

MOTION TO COMPEL SUSPICIOUS PEOPLE INVESTIGATION

Plaintiff respectfully requests the court to grant this MOTION TO COMPEL so that defendant will review their employment database for purposes of SUSPICIOUS PEOPLE INVESTIGATION. Plaintiff attempted discovery and defendant has steadfastly refused.

Plaintiff submitted a list of five (5) names to defendant for purposes of reviewing their employment database to determine if any of the named people were presently employed or had ever been employed by the defendant or any of non-charged defendant entities. Plaintiff suggested to defendant via email during pre-planning for the March 23 Scheduling Meeting that the entire McCarley case could well be the result of illegal activities of defendant employees, thus possibly exonerating defendant corporation. Plaintiff suggested such an act would go far to exonerate the defendant corporation. As has become typical, defendant refused this simple step. Their refusal provides yet further evidence for jury trial. However, plaintiff and the court should insist on gaining knowledge of this information. Plaintiff has taken the step of phoning the HSBC employment verification service, only to be put on indefinite hold each time.

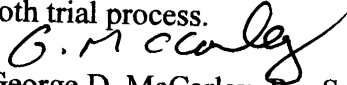
The court will find this original request on the MOTION TO COMPEL filed with the court and dated September 28, 2007, and Interrogatory question 20.

¹ 3:06 cv 00091 (lead case) includes Household Finance Corporation, III (00093), HSBC-Gr. Corp. (00102), HSBC Mortgage Services, Inc. (00104), HSBC Finance Corporation (00101), and, Household International, Inc. (00103).

Among the five names are two names involved with mortgage initiation and closing, and now having dropped out of sight; a Real Estate agent in Georgia who spent far more money on gasoline driving to Roanoke, Alabama than he would make in profit on the sale - - the same agent having an identity in Idaho, and, a Real Estate buyer having an address near the Florida operations center of HSBC. Should any of the people named be proven to have employment history with HSBC, then many other charges, both civil and criminal should be considered by both plaintiff and the government.

This is one of several motions necessitated by: (i) Defense failure to provide key information demanded on Discovery, or, (ii) follow-up information due to new questions raised by discovery provided, or, (iii) critical information required to properly define information or terms used on official defendant forms, and thus required to facilitate a smooth trial process.

Respectfully submitted


George D. McCarley, Pro Se
216B Chestnut Street
Roanoke, Al 36274

PROOF OF SERVICE

I, George D. McCarley, do swear or affirm that on November 12, 2007, I have served the enclosed ACTION on each party to the above or that party's counsel, and on every other person required to be served, by depositing envelope containing the above documents in the United States Mail properly addressed, and with first class postage prepaid, for delivery within 3 calendar days.

The Clerk


Middle District of Alabama, Eastern Division
One Church Street, PO Box 711
Montgomery, Al 36101-0711
334-954-3600

Defendant Attorney

Mr. George Parker
Bradley Arant Rose and White
Alabama Center for Commerce
401 Adams Avenue, Suite 780
Montgomery, Al 36104

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 12, 2007


George D. McCarley